UNITED STATES BANKRUPTCY COURT DISTRICT OF MARYLAND (Greenbelt Division) PM 3: 20

STANDER TO SELECT

In Re: Angela M. Guerrieri											
						*	Case No. 18-1-5537 (Chapter 13)				
* *	*	*	*	*	*	*	*	*	*	*	
Van Franke, Plaintiff 10233 Parkwood Court Kensington, MD 20895											
v.	Ź					*	Adv	ersary I	Proceedi	ing 18-ap-	-00371
						*					
Angela M. Guerrieri, Defendant											
6009 So	noma R	ld				*					
Bethesda	a, MD 2	20817				*					
* *	*	*	*	*	*	*	*	*	*	*	

ANSWER

Comes now Angela M. Guerrieri, the Debtor, Pro Se to answer the complaint of the Plaintiff and responds as follows:

- 1. Defendant generally denies the allegations.
- 2. Defendant generally denies the respective counts in the complaint.
- 3. Defendant asserts all applicable defenses to these counts.
- 4. Defendant believes the ongoing nature of these disputes show the Plaintiff to be overly aggressive and unwilling to act, generally, in the best interests of the children.
- Defendant believes the Plaintiff is purposely incurring attorney fees because
 Defendant cannot both afford the child support and to continue paying her own attorney fees.

Wherefore, for the foregoing reasons the Defendant request the Court deny any relief to the Plaintiff.

Respectfully Submitted,

Angela M. Guerrieri

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 12th day of November 2018, copies of the foregoing Answer to the complaint were mailed to the Plaintiff and Plaintiff's Attorney.

Van Franke 10233 Parkwood Court Kensington, MD 20895

Counsel for Van Franke Jeffery M. Orenstein Wolff & Orenstein, LLC Shady Grove Plaza 15245 Shady Grove Plaza Rockville, MD 20850

Respectfully submitted,

ngela M. Guerrieri